

## EXHIBIT 316

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION

4 IN RE: NATIONAL )  
5 PRESCRIPTION ) MDL No. 2804  
6 OPIATE LITIGATION )  
7 ) Case No.  
8 ) 1:17-MD-2804  
9 )  
10 THIS DOCUMENT RELATES ) Hon. Dan A.  
11 TO ALL CASES ) Polster  
12 )

13 FRIDAY, JANUARY 4, 2019

14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
15 CONFIDENTIALITY REVIEW

16 - - -

17 Videotaped deposition of Ramona  
18 Sullins, held at the offices of JONES DAY, 77  
19 West Wacker Drive, Chicago, Illinois,  
20 commencing at 7:31 a.m., on the above date,  
21 before Carrie A. Campbell, Registered  
22 Diplomate Reporter, Certified Realtime  
23 Reporter, Illinois, California & Texas  
24 Certified Shorthand Reporter, Missouri &  
25 Kansas Certified Court Reporter.

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Q. And you believe that occurred  
sometime in 2010; is that correct?

A. '10 or '11. I don't recall.

Q. Before that rollout occurred,  
did Walmart have a monitoring program in  
place?

A. Yes.

Q. And what was that program?

A. I believe it was a 405 report,  
and they monitored orders as they came in.

Q. Okay. And what do you mean  
by -- when you say "they monitored orders as  
they came in," what does that mean?

A. So the distribution center did  
and the associates did.

Q. Are the associates at the  
distribution center?

A. Yes.

Q. Okay. Anyone other than the  
associates at the distribution center that



1 would monitor orders?

2 MS. FUMERTON: Objection.

3 Form.

4 QUESTIONS BY MR. BOWER:

5 Q. And I'm just trying -- just so  
6 the record is clear, I'm just trying to  
7 understand your answer.

8 You said "the distribution  
9 center did and the associates did." Are  
10 those two different things in your mind?

11 A. They're all at the distribution  
12 center.

13 Q. And what were the associates  
14 doing prior to the rollout of Reddwerks?

15 A. So my understanding is that  
16 they would -- they would let their manager  
17 know if they saw an order that was out of the  
18 ordinary.

19 Q. What do you mean by "out of the  
20 ordinary"?

21 A. Like, for example, ReliOn  
22 insulin, we had orders that would -- where  
23 the pharmacy would think that they were  
24 ordering ten vials of insulin, and they  
25 actually ordered a hundred of them because

1     they were in packs of ten. So those would be  
2     examples of what they would bring to their  
3     attention.

4             Q.       And in fact, Walmart had an  
5     automatic cut for those instant orders,  
6     correct?

7                     MS. FUMERTON: Objection.

8             Form.

9             Go ahead.

10                    THE WITNESS: For the what now?

11     QUESTIONS BY MR. BOWER:

12             Q.       For those insulin orders that  
13     you just -- the example that you just  
14     provided, Walmart actually had an automatic  
15     cut for those orders, didn't they?

16                    MS. FUMERTON: Objection.

17             Form.

18                    THE WITNESS: It was a manual  
19     cut; it wasn't automatic.

20     QUESTIONS BY MR. BOWER:

21             Q.       A manual cut that was  
22     automatically applied to insulin orders,  
23     correct?

24                    MS. FUMERTON: Objection.

25             Form.

1 THE WITNESS: They would call  
2 the store to inform them that they had  
3 placed -- if they really wanted a  
4 hundred because, I mean, the  
5 refrigerator didn't hold a hundred.

6 QUESTIONS BY MR. BOWER:

7 Q. Right.

8 And that was specific to  
9 insulin, correct?

10 A. That's correct.

11 Q. Okay. What about with respect  
12 to Schedule II narcotics, what were the DCs  
13 doing in 2008?

14 MS. FUMERTON: Objection.  
15 Form.

16 THE WITNESS: My understanding  
17 is they would do the same thing with  
18 that.

19 QUESTIONS BY MR. BOWER:

20 Q. And where does that  
21 understanding come from?

22 A. Just from when I was training  
23 in 2008, when I was out at the DCs training.

24 Q. Okay. So what specifically did  
25 you learn in connection with your training

1     that the DCs were doing for Schedule II  
2     narcotics?

3                     MS. FUMERTON:  Objection.  
4                     Form.

5                     THE WITNESS:  So again, they  
6                     would look at that paper and let their  
7                     supervisor or manager know that this  
8                     appears to be out of the ordinary or  
9                     unusual.

10    QUESTIONS BY MR. BOWER:

11                    Q.     And at that point -- and we're  
12                    talking 2008, correct?

13                    A.     Yes.

14                    Q.     At that point, how was DC 6045  
15                    receiving orders?  They were paper, correct?

16                    A.     So those would come in  
17                    electronically.  They're printed on paper.

18                    Q.     They would come in  
19                    electronically once a day?

20                    A.     That's correct.

21                    Q.     And then they would print it on  
22                    paper at the DC?

23                    A.     That's correct.

24                    Q.     And then what would happen to  
25                    those papers?

1           A.       Well, first they would print  
2     the 222 form, sign those, and then that and  
3     the paper order would be put together in a  
4     packet, and the associates would fill orders  
5     based on that paper order.

6           Q.       And was it the practice for the  
7     orders to be filled and shipped the same day  
8     they came in?

9           A.       Yes.

10          Q.       And approximately how many  
11     orders came in to DC 6045 on a daily basis  
12     during this time period?

13          A.       I don't recall how many orders  
14     came in.

15          Q.       Would it have been in the  
16     hundreds of orders? Could it have been in  
17     the hundreds of orders per day?

18          A.       Well, they filled store  
19     order -- store only got an order once a week  
20     of C-IIs. So if you divide it up, however  
21     many stores we had at the time, that's how  
22     many orders they would -- processed, four  
23     days a week.

24          Q.       That's fine.

25                    You said four days a week?

1 A. Yes.

2 Q. So, for example, if there were  
3 4,000 stores, approximately a thousand orders  
4 a day, correct?

5 A. Potentially.

6 [REDACTED]

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